

EXHIBIT 1

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DON HOLLAND, individually and on behalf §
of all others similarly situated, §
§

Plaintiff, §
§

CIVIL ACTION NO.: 1:23-cv-110

v.

CRYPTOZOO, INC., a Delaware §
Corporation, LOGAN PAUL, DANIELLE §
STROBEL, JEFFREY LEVIN, EDUARDO §
IBANEZ, JAKE GREENBAUM a/k/a §
CRYPTO KING, and OPHIR BENTOV §
a/k/a BEN ROTH §
§

Defendants. §
§

UNSWORN DECLARATION OF LOGAN PAUL

I, Logan Paul, declare as follows:

1. I am over the age of 18, of sound mind, and am competent to make this declaration. The facts stated in this declaration are based on my own personal knowledge, and are true and correct to the best of my knowledge. I would and could competently testify to these facts if called as a witness.
2. I have never lived or worked in the State of Texas. I reside in Dorado, Puerto Rico.
3. I have traveled to the State of Texas for a total of less than two weeks in the last approximately ten years. None of those trips related to the “CryptoZoo” game.
4. I have never maintained a business office in the State of Texas.
5. I have never owned or leased any property in the State of Texas.
6. I have never hired any employees in the State of Texas.
7. I have never paid or owed any taxes to the State of Texas or any of its political subdivisions.

8. I have never been required to maintain, or maintained, a registered agent for service in the State of Texas.

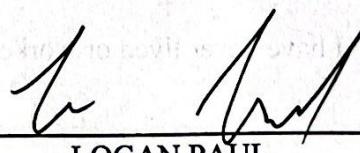
9. I have never sued anyone in the State of Texas and, other than this lawsuit, I have never been sued in the State of Texas.

10. I have reviewed the complaint in this case. The complaint quotes statements that I allegedly made regarding the CryptoZoo game. I made the statements referred to in paragraph 37 of the complaint on my podcast “Impaulsive” that was recorded while I was in Puerto Rico. I do not produce my podcast in Texas, and I do not specifically direct my podcast to residents of Texas. My podcast attracts a worldwide audience.

11. I did not specifically target Texas residents in any statement that I made regarding the CryptoZoo game.

12. I did not communicate with any Texas residents, including Plaintiff Don Holland, regarding the CryptoZoo game, knowing that they were Texas residents at the time. To the best of my knowledge, I did not post any online messages about the CryptoZoo game, including the messages identified in paragraphs 13-15 of the complaint, while physically present in Texas.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 18, 2023 at Dorado, Puerto Rico.



LOGAN PAUL